

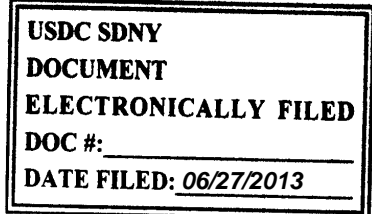
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Honorable Katherine Polk Falia
United States District Judge
Southern District of New York
Thurgood Marshall
United States Courthouse
Room 618
40 Foley Square
New York, New York 10007

Re: American Stevedoring Inc .v Int'l Longshoremen's Ass'n Et. Als.
Civil Action No. 13-Civ-0918 (DCF)

Dear Judge Falia,

The undersigned is attorney for Michael Farino in the above entitled action.

I am in receipt of the letter of Weiss & Hiller, P.C. requesting a 30 day extension of time to July 25, 2013 to answer the defendant Farino's counterclaims and as well the Third Party Complaint for the third party defendants Sabato Catucci and Keith Catucci.

The undersigned hereby consents to the sought extension of time to July 25, 2013.

There are additional issues regarding the pleadings on file, including without limitation, the following:

1. The amended complaint filed by Weiss & Hiller PC was filed subsequent to the filing by the undersigned of Defendant Farino's Answer and required an Order authorizing the filing of the amended complaint, absent a stipulation.

2. The issue of the filing of a further amended Answer and Third Party Complaint by the undersigned is complicated at this point in time by the fact that other Third Party Defendants whom Weiss & Hiller PC do not represent have been served. Thus, the refiling will require re-service, unless the attorney for third party defendants whom Hiller & Weiss do not represent stipulates that he will accept service, which has not occurred to date.

The undersigned believes these issues will be worked out over the next 30 days.

Accordingly, as indicated the undersigned consents to the extension of time sought by Weiss & Hiller PC to July 25, 2013.

Yours, Etc.

Steven M. Schaffer, Esq.